

4.6 RADLEY LAKES AREA

4.6.1 CONTEXT

The Radley Lakes area, in the south of the parish (see Map 6), has exceptional potential for quiet recreation and nature conservation¹. It has beautiful lakes, diverse habitats and ecology, is popular for angling and leisure walking and is strategically placed between the Thames Path and Abingdon. It is within easy reach of thousands of people, promoting their health and well-being. The area also currently has minerals and commercial uses of economic importance. These uses potentially conflict but need not do so provided that there is an overarching framework to guide them. This so far has been lacking and this Neighbourhood Plan provides the opportunity to put that right.

The area is in the Thames flood plain. All is designated as Green Belt and almost all as a Conservation Target Area². It was originally agricultural, but from the mid-1950s was worked for sand and gravel under planning permissions requiring restoration to greenfield when the mineral extraction has been completed. About 1m tonnes towards the south of the area remain to be exploited, but little has been extracted since the early 1990s and none since about 2004.

Since the extraction of minerals started there have been significant developments.

- Unrelated commercial and industrial activity has become established. Buildings and land that had planning permissions for uses ancillary to extraction have since been put to other industrial and commercial uses. There are two concrete batching plants, the feedstock for which is imported from extraction sites elsewhere, and other commercial premises with uses such as car repair unconnected with minerals. These have been operating under a mix of unlawful development, certificates of established use and temporary permissions. At no point has there been any overarching consideration of their appropriateness.

- The potential for nature conservation and quiet recreation has been increasingly recognised. For many years the exhausted mineral workings were being backfilled with pulverised fuel ash from Didcot power station prior to restoration to mainly agriculture. The area to the east of the railway has been restored in this way. However, the position to the west of the railway has changed. In 2008 it was agreed with the power station owners that Thrupp Lake should not be backfilled but should instead become an area for local leisure access and nature conservation leased and managed by the Earth Trust. Since then it has become a popular attraction. Shortly afterwards the planning conditions were changed for other workings that had been backfilled but not yet restored (shown as 'infilled lakes' on Map 6), so that the required end use is now nature conservation. Good progress is being made towards their restoration, with aftercare due to be completed by December 2020, but there is not yet any plan for the management of the land after that.
- Access problems have intensified. Originally the minerals extracted from the area were taken by lorry towards Barton Lane in Abingdon or Lower Radley near the railway bridge. In more recent years the sole access route has been Thrupp Lane, a long narrow country lane in extremely poor condition with sharp bends that is quite unsuitable for this use. This same road has during this period been designated as part of Sustrans National Cycle Route 5, and is potentially a very attractive route for leisure walkers and cyclists going to the Radley Lakes area. The conflicts between these uses of the Lane are already severe and dangerous, and any intensification or prolongation of commercial activity would add to this severity.³

The background and planning history of the area is set out in more detail in a paper prepared to inform work on this Plan.⁴

In the May 2016 consultation there was very strong resident support for a new strategy for the Radley Lakes area to reconcile the various different uses and to maximise its potential for nature conservation and quiet recreation. 78%

¹ The potential is well documented in the Radley Parish Council website section about the Lakes. This includes details of flora and fauna, community volunteering and events to learn about the wildlife and ecology, www.radleyvillage.org.uk/ourvillage/nature-2/the-radley-lakes/

² CTAs are designated in the Biodiversity Action Plan for Oxfordshire and have priority protected status under CP46 of the Local Plan. The great majority of the Lakes area is also designated as Local Wildlife Site (LWS). The main difference between the designated areas is that the LWS area excludes some land which has permission for further mineral extraction.

³ See *Thrupp Lane Traffic Survey, April 2016* for details of HGV movements and the problems arising

⁴ *Minerals, industrial and commercial uses in the Radley Lakes area: an outline planning history*

were in favour, 14% no firm view and 8% against¹. Those in favour came from all parts of the parish, not just those nearest the Lakes area. Additionally in the December 2016 consultation there was strong support from statutory bodies, nature conservation groups and those landowners who responded.

4.6.2 OUTCOMES SOUGHT: A STRATEGY FOR RADLEY LAKES

A new overarching approach for the Radley Lakes area is required, with a long-term vision that can guide other decisions and processes, based on the following five principles.

- (i) The end goal should be to realise the high potential of the area for nature conservation and quiet recreation, of benefit to the wider area.
- (ii) The process needs to be gradual, taking account of the expiry of existing planning permissions, most of which are time limited.
- (iii) Key to unlocking this potential is a new access solution which removes the current conflicts between cyclists and pedestrians and heavy vehicular traffic.
- (iv) If the road access is solved there is scope for limited commercial use without impacting adversely on the area as a whole.
- (v) A co-operative approach is needed involving relevant councils, landowners, operators and amenity groups.

Nature conservation and quiet recreation

The vision in this Plan is for an area where:

- habitats for wildlife species are created and protected and the designated Local Wildlife Sites are safeguarded;
- peaceful recreational activities such as rambling, pond-dipping, bird watching and angling can be enjoyed;
- access is provided by footpaths through the site linking with existing rights of way, including the Thames Path;
- the health, well-being and environmental understanding of visitors is enhanced.

Achieving this requires supportive planning policies and also proactive land management.

Planning Policy. The policy below is designed to set appropriate conditions for any future development to ensure it promotes rather than prejudices nature conservation and quiet recreation. Map 7 defines the area where this would apply. It follows the natural boundaries of the Thames, the parish boundary and the railway. It is largely co-terminous with the Conservation Target Area (CTA) to the west of the railway, but includes an area of industrial activity adjacent to the CTA (the JCSL industrial site) which has a potential impact on land within the CTA. The area to the east of the railway has been excluded because it has already been restored and is mainly in agricultural use.

Proactive land management. This needs to build on work currently in progress and to be guided on a coherent and sustainable basis by a master-plan addressing the following.

- **Boundaries.** The area to be managed for nature conservation and quiet recreation need not align precisely with the planning policy area at Map 7. It might for example exclude small areas where there is housing or commercial uses, and could also potentially be extended across the parish boundary into the similar Barton Fields area in Abingdon-on-Thames. This would be a matter for agreement by the stakeholders.
- **Phasing.** It will be sensible for individual sites to be brought within active land management on a phased basis, taking account of manpower and funding constraints and the completion of mineral activities and restoration. A natural start point is Thrupp Lake, which is already open to access, followed by the ash areas due to complete their aftercare in 2020.
- **Sub-areas and internal access routes.** The area is large enough to accommodate both nature conservation and quiet recreation, but careful planning will be needed to allow a full range of uses without conflict.
- **Management and funding arrangements.** Funding needs to provide for initial capital works but also for longer-term revenue sustainability.

It is important that this master planning process involves all parties with an interest: the local councils, (including Abingdon-on-Thames town

council), landowners, the Earth Trust, the Friends of Radley Lakes, Abingdon Naturalists and other amenity and nature conservation bodies.

Mineral extraction and restoration

There are extant planning permissions for extraction of the remaining gravel in the south-west of the area, and planning conditions for restoration still apply to a large area of former workings. Minerals are a county matter so this Neighbourhood Plan will have no effect on these permissions and conditions. The Plan is rather concerned with the next steps after minerals workings and restorations are complete. It is helpful in this respect that the current planning conditions require the land to be restored for nature conservation¹.

Other industrial and commercial uses

These uses have nothing to do with minerals extraction for which permissions were originally given and have sprung up in an unplanned and largely unlawful way². The existing permissions for most of these uses require that the sites should be restored to greenfield.

While this would be consistent with this strategy and reduce the traffic problems on Thrupp Lane a case could nevertheless be made for continued employment activity on currently occupied land in the Lakes area provided that it did not adversely impact on the wider area as one of quiet recreation and nature conservation. This might in particular apply to the land currently occupied by the JCSL industrial estate, which is right on the edge of the area close to Audlett Drive and could be screened relatively easily.

Because the site is in Green Belt and subject to minerals restoration conditions, permanent development would be consistent with the Local Plan only if there were 'very special circumstances'. In RPC's view this could well be the case if the development was served by a new access towards Audlett Drive which took not only the traffic from the site but also the heavy vehicles serving the concrete batching works, thereby removing the traffic conflicts which are blighting the safety and amenity of the Lakes area. In the

absence of such a solution it would be difficult to justify permissions to prolong or intensify current commercial and industrial activity or any similar new activity. It would be preferable for the land to be restored to greenfield.

Access

As discussed in Sections 4.7 and 4.8, the Plan's preferred solution would be to:

- create a new vehicular access westward from the JCSL industrial estate towards Audlett Drive, either direct or via Barton Lane;
- close Thrupp Lane to vehicular traffic just above the Tuckwells mineral yard so cyclists and walkers would be able to access Radley Lakes safely without conflict with mineral lorries and other industrial traffic.

A new route towards Audlett Drive would be much shorter and less tortuous than the current Thrupp Lane access. It has practical and cost challenges, and could not be achieved without use of private land, but this is largely in the same ownership and control as the JCSL industrial estate, who would benefit from the prospect of gaining permanent planning permissions and security for future investment. It is in the interests of all parties to work towards a solution and to contribute to the cost.

The very short stretch of Thrupp Lane proposed to be closed to vehicles is a metalled Byway Open to All Traffic (BOAT). A Traffic Regulation Order would be required, and it would need to be demonstrated – as would be the case – that the new access provided a satisfactory alternative for existing users. It could be considered at the same time whether the unmetalled continuation of the BOAT to Barton Lane should be downgraded to bridleway, but this is a lesser issue as its use by vehicles is not at present significant.

Other issues

In the December consultation exercise there was some concern from the Vale of White Horse District Council and Oxfordshire County Council that the wording of the planning policies needed amendment to ensure compliance with the Basic Conditions Test and in particular to

¹ Oxfordshire County Council (OCC) have set in hand a Review of Old Minerals Permissions (ROMP). This potentially provides an opportunity to update the planning conditions to limit environmental impacts and to ensure that the timing and logistics of extraction are as far as appropriate consistent with the wider strategy for the Lakes area. However, the minerals operators did not submit an application by the deadline of October 2016. As a consequence, OCC have placed the site in suspense. If by October 2018 OCC are satisfied that minerals extraction has in practice ceased, they are under a duty to serve a prohibition order on further activity. If this occurs it would bring forward the potential timing for land to be managed for quiet recreation and nature conservation.

² See *Minerals, industrial and commercial cases in the Radley Lakes Area, an outline planning history*.

avoid any implication that policy was being created for minerals. The Environment Agency were concerned to ensure that flood risks were appropriately addressed. There has been dialogue with all three bodies as a result of which the policies have been restructured and reworded.

Strategic Environmental Assessment (SEA)

As part of the Strategic Environmental Assessment of this Plan, an independent appraisal was carried out by AECOM of two alternative options for the Radley Lakes area; one based on nature conservation alone (Option 1) and the other based on nature conservation and quiet recreation in combination (Option 2). The findings of this appraisal are contained in the *Environmental Report*¹ submitted as a supporting document to this Plan.

The planning conditions for former minerals working in the Lakes area already require restoration for nature conservation, as appraised under Option 1. The important policy issue is whether the area should be actively managed for both nature conservation and quiet recreation. That is the proposal in the Neighbourhood Plan and was appraised as Option 2.

The report shows that Option 1 would bring significant benefits, especially for biodiversity. Option 2 is shown to bring additional benefits, most significantly for the health of residents, without diminishing the benefits from nature conservation. A key consideration here is the size of the area, which – if properly planned and managed - enables conflicts to be avoided. The report also highlights the importance of providing a new access route to the Lakes area, removing the current road safety hazards: it finds that providing for quiet recreation will help provide momentum for a solution, but that the full benefits will not be realised unless and until such a solution is realised.

These findings support the strategy and policies in this Plan. Specifically Planning Policy PP.8 supports nature conservation and quiet recreation land uses, Community Action CA.10 promotes the active management of the land for these purposes and Community Action CA.11 promotes the creation of a new access solution. In carrying forward the Community Actions, RPC will work in partnership with other stakeholders and will take account of the more detailed findings in the report, including the potential to provide benefit for Abingdon residents through linked walking routes.



View of Thrupp Lake



MAP 6.
**RADLEY LAKES,
INCLUDING
SURROUNDING AREA**

This map provides an overview of the Radley Lakes area and its surroundings.

KEY

- 1 Old coal yard
- 2 John Curtis and Sons Ltd Industrial Estate
- 3 Lafarge Tarmac Concrete Processing Plant
- 4 H Tuckwell & Sons Ltd Quarry and Processing Plant
- 5 Nature walk around Thrupp Lake
- 6 Land with extant permission for mineral extraction
- 7 Possible new link road routes from Thrupp Lane to Audlett Drive and Barton Lane
- 8 Sustrans National Cycle Route 5
- 9 Possible no-through road point on Thrupp Lane for vehicular traffic

Relationship with Local Plan

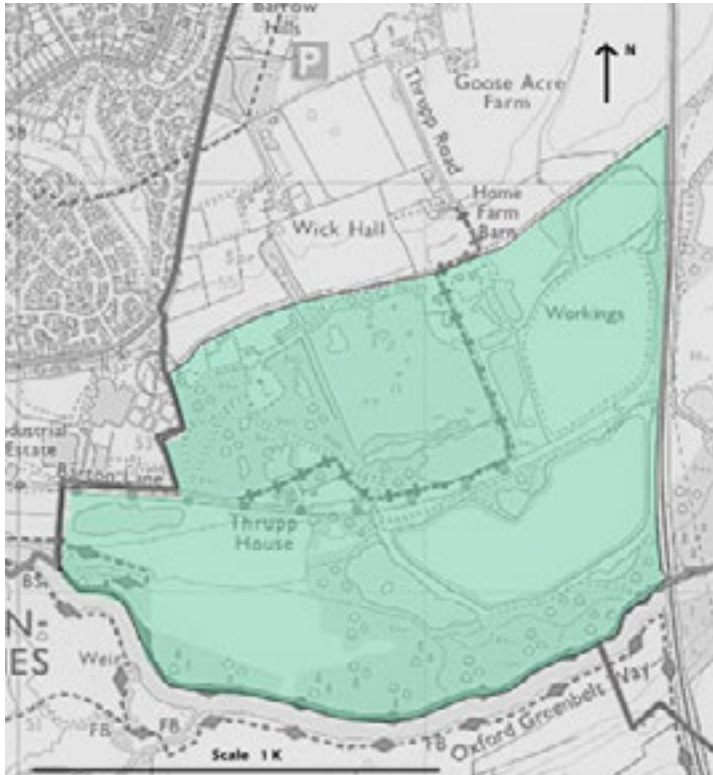
The Local Plan does not contain any area-based policies directed at the Radley Lakes area, but there are relevant generic policies.

- CP13 (*The Oxford Green Belt*) sets out the kinds of development that are permissible in the Green Belt, including re-use of brownfield buildings.
- CP28 (*New Employment Development on Unallocated Sites*) sets out the conditions which need to be met for new employment sites including safe site access and impacts on amenity.
- CP33 (*Promoting Sustainable Transport and Accessibility*) sets out policies for the road network and site access. These are all relevant to the commercial development at the foot of Thrupp Lane and the related issues about the road itself.
- CP42 (*Flood Risk*) sets out policy in relation to flood risk, and is relevant because most of the area is in Flood Risk Areas 2 and 3

- CP46 (*Conservation and Improvement of Biodiversity*) actively supports ‘opportunities for biodiversity gain, including the connection of sites, large scale habitat restoration, enhancement and habitat re-creation’; it gives particular priority to Conservation Target Areas.

This Radley Lakes strategy is area-based, and is set out at a much more detailed level, but is in conformity with all these policies.

Policy PP8 applies to the Radley Lakes area as defined in Map 7. Minerals and waste matters fall outside the scope of this Plan. On this basis the policy refers to long term uses for the site. It does not directly address issues which might prejudice general minerals and waste matters or compliance with planning conditions affecting this particular site.



**MAP 7.
RADLEY LAKES:
THE AREA TO WHICH
PLANNING POLICY 8
APPLIES**

The shaded area is a smaller area than shown in Map 6, and is where the formal planning policy promoting nature conservation and quiet recreation has effect.



Part of the J Curtis & Sons Ltd industrial estate

4.6.3 POLICIES

PLANNING POLICY

PP8 Radley Lakes

Development which directly promotes nature conservation and/or quiet recreation in the area will be supported, subject to the following criteria:

- comply with CP13, which sets out limited circumstances in which Green Belt development might be appropriate;
- avoid detriment to the wider landscape within which the site sits, and be accompanied by any natural screening needed to achieve that;
- comply with CP42, which requires a site-specific flood risk assessment for all development in Flood Zone 2 and 3 and for appropriate mitigation and management measures to be implemented;
- avoid detriment to the integrity of the local ecology by incorporating appropriate measures in development proposals. Where appropriate these will include avoidance measures, mitigation measures and compensation measures; and
- include appropriate transport mitigation.

Development which creates new or revised access routes to or through the area will be supported, subject to the five criteria above if it, directly or indirectly:

- improves the safety and amenity of access to the area by pedestrians and cyclists; and
- contributes to the promotion of nature conservation and quiet recreation in the Radley Lakes area.

Any other development will be supported only if it meets the five criteria above and

- is confined to currently built-up land;
- is served by a suitable and safe access route that avoids conflicts between vehicles accessing the site and pedestrians and cyclists accessing the wider area.

COMMUNITY ACTIONS

CA.10 Radley Lakes

RPC will facilitate the preparation of a masterplan for the detailed management of an area of nature conservation and quiet recreation in former minerals workings in the south of Radley. The masterplan will be informed by the Neighbourhood Plan Radley Lakes Strategy. All stakeholders will be involved in its preparation, including landowners, VWHDC, Abingdon-on-Thames Town Council and local conservation and amenity groups.

4.7 ROADS

4.7.1 CONTEXT

Radley's roads serve a variety of different uses, including:

- car trips by residents for work and leisure purposes;
- access from outside Radley to the station and other village facilities;
- leisure walking and cycling by residents, especially towards the Thames at Lower Radley and towards the Radley Lakes area via Thrupp Lane;
- heavy minerals lorries and commercial vehicles accessing the concrete batching and commercial premises at the foot of Thrupp Lane;
- through traffic between Abingdon and Kennington;
- the 35 bus service towards Abingdon and Oxford (this is at present every 20 minutes during daytime).

The current road network dates to a much smaller village and is not designed for its current shape and size, nor for the conflicting types of traffic use. The proposed development sites risk making these problems worse by adding to traffic volumes but also potentially provide the opportunity to find solutions for them.

The following main problems were identified during preparation of the Neighbourhood Plan, and confirmed in responses to the consultation exercises.

- In the central village, it is unclear whether White's Lane or Foxborough Road/Church Road is the route designated for through traffic. The